

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

THOMAS SIERRA,)	
)	No. 18 C 3029
<i>Plaintiff,</i>)	
)	Hon. John Z. Lee,
<i>v.</i>)	District Judge
)	
REYNALDO GUEVARA, <i>et al.</i> ,)	Hon. M. David Weisman,
)	Magistrate Judge
<i>Defendants.</i>)	

PARTIES' JOINT STATUS REPORT

Pursuant to Paragraph 5 of the Third Amended General Order 20-0012 (Dkt. 179), and the Court's Order (Dkt. 189), the parties submit the following joint status report:

A. Progress of Discovery

1. Since the parties last appeared for a status hearing in this case, the parties have continued to engage in written discovery and are working to coordinate video depositions of several third-party witnesses.

Pursuant to the parties' Amended Proposed Joint Scheduling Order¹ regarding *Monell* production, the City will begin production of CRs, Investigative Files, and RD Files on a rolling basis starting September 25, 2020, occurring again on October 26, 2020, with production to be completed by November 30, 2020.

¹ On April 3, 2020, the City tendered to the Magistrate Judge a proposed order which the Magistrate Judge has not yet signed and entered. Since tendering the proposed order, Third Amended General Order 20-0012 was entered extending all deadlines by 28 days. The dates reflected in this status report account for the automatic 28-day extension.

B. Pending Motions

2. There are no currently pending motions in this case.

C. Settlement Efforts

3. There are no current settlement discussions in this case.

D. Proposed Schedule for the Next 45 Days

4. The parties do not believe any specific schedule need be set for the next 45 days. The parties will continue to conduct written discovery, are conferring about outstanding discovery, and are conferring about depositions that are appropriate to conduct via video.

E. Proposed Revised Discovery and Dispositive Motion Schedule

5. There currently is no fact discovery cut off. The parties still have several party and third-party depositions to take, some of which the parties are currently working to schedule as remote video depositions. The Court has not yet set an expert discovery or dispositive motion deadline. The parties are not requesting that this Court set expert discovery or dispositive motion deadlines at this time.

F. Any Agreed Action the Court can Take Without a Hearing

6. Other than entering the agreed proposed order addressed above, none at this time.

G. Need for a Telephonic Hearing with the Court

7. The parties do not believe a telephonic hearing with the judge is urgent or necessary at this time.

Dated: June 4, 2020

Respectfully submitted,

/s/ Sean Starr
Jon Loevy
Anand Swaminathan
Steven Art
Josh Tepfer
Sean Starr
Rachel Brady
John Hazinski
Loevy & Loevy
311 N. Aberdeen St.
Chicago, Illinois 60607
(312) 243-5900
For Plaintiff

MARK A FLESSNER
Corporation Counsel of the
City of Chicago

/s/ Eileen E. Rosen
Eileen E. Rosen
Catherine M. Barber
Theresa Berousek Carney
Austin G. Rahe
Special Assistant
Corporation Counsel
Rock Fusco & Connelly,
LLC
321 N. Clark Street, Suite
2200
Chicago, Illinois 60654
(312) 494-1000
**For Defendant City of
Chicago**

/s/ Josh M. Engquist
James G. Sotos
Josh M. Engquist
Jeffrey R. Kivetz
David A. Brueggen
Special Assistant
Corporation Counsel
The Sotos Law Firm, P.C.
141 W. Jackson, Suite
1240A
Chicago, Illinois 60604
(630) 735-3300
**For Defendants JoAnn
Halvorsen, as Special
Representative for the
estate of Ernest
Halvorsen, Wojcik,
McMurray, Figueroa,
and Biebel**

/s/ Thomas M.
Leinenweber
Thomas M. Leinenweber
James V. Daffada
Kevin E. Zibolski
Special Assistant
Corporation Counsel
Leinenweber Baroni &
Daffada, LLC
120 N. LaSalle Street,
Suite 2000
Chicago, Illinois 60602
(312) 663-3003
**For Defendant
Guevara**

CERTIFICATE OF SERVICE

I, Sean Starr, an attorney, hereby certify that on June 4, 2020 I caused the foregoing Joint Status Report to be filed using the Court's CM/ECF system, thereby effectuating service on all counsel of record.

/s/ Sean Starr
Attorney for Plaintiff